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23 *Attorneys for Defendant Bank of America, N.A.*

24 **UNITED STATES DISTRICT COURT**

25 **DISTRICT OF NEVADA**

26 SFR INVESTMENTS POOL 1, LLC,
27 Plaintiff,
28 vs.
29 BANK OF AMERICA, NA, SUCCESSOR BY
30 MERGER TO BAC HOME LOANS
31 SERVICING, LP FKA COUNTRYWIDE HOME
32 LOANS SERVICING, LP,
33 Defendants.

34 Case No. 2:19-cv-01534-JCM-DJA

35 **STIPULATION AND ORDER TO
36 CONTINUE RESPONSE DEADLINE TO
37 SFR'S MOTION FOR
38 RECONSIDERATION FOR ORDER
39 (FIRST REQUEST)**

40
41 Defendant, BANK OF AMERICA, N.A., Successor by Merger To BAC Home Loan
42 Servicing, LP, f/k/a Countrywide Home Loans Servicing, LP (**BANA**), by and through its attorneys
43 of record, the law firms of GERRARD COX LARSEN and AKERMAN LLP, and Plaintiff SFR

1 INVESTMENTS POOL 1, LLC (SFR), by and through its attorneys of record, the law firm of KIM
 2 GILBERT EBRON file this stipulation to extend time to respond to SFR's Motion For
 3 Reconsideration by seven (7) days. This is BANA's first request for an extension of time to respond
 4 to SFR's Motion For Reconsideration of Order.

5 1. WHEREAS, on October 3, 2019, Defendant BANA filed a Motion to Dismiss
 6 [ECF No. 9] against Plaintiff SFR, arguing that SFR's quiet title claims were barred by a five-year
 7 statute of limitations.

8 2. WHEREAS, on October 2, 2019, SFR filed a Motion for Summary Judgment [ECF
 9 No. 13] against BANA.

10 3. WHEREAS, on November 14, 2019, BANA filed an Opposition to SFR's Motion for
 11 Summary Judgment and Countermotion for Summary Judgment [ECF No. 17] ("BANA's MSJ")
 12 against Plaintiff SFR.

13 4. WHEREAS, on June 11, 2020, this Court entered an Order [ECF No. 36] granting
 14 BANA's MSJ finding that SFR's claims were barred by a five-year statute of limitation.

15 5. WHEREAS, on July 3, 2020, Plaintiff SFR filed its Motion for Reconsideration of
 16 Order [ECF No. 38] based on the new authority from the Nevada Supreme Court in *Berberich v.*
 17 *Bank of Am., N.A.*, 136 Nev. Adv. Op. 10, 460 P.3d 440, 443 (2020).

18 6. The parties believe good cause exists for this request. BANA's counsel have been
 19 either (i) presently on vacation with family and is out of state or (ii) became unexpectedly ill,
 20 preventing BANA from completing the response in time under Local Rule 7-2(b). A brief one-week
 21 extension will permit counsel to adequately prepare a response. Accordingly, the parties stipulate to
 22 extend time for BANA to file its Response to SFR's Motion for Reconsideration up to and including
 23 **July 24, 2020.**

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1 7. This Stipulation is made in good faith and not for purpose of delay.

2 DATED this 16th day of July, 2020.

2 DATED this 16th day of July, 2020.

3 **GERRARD COX LARSEN**

4 /s/ Douglas D. Gerrard, Esq.

5 Douglas D. Gerrard, Esq.

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20 DATED this 16th day of July, 2020.

21 **KIM GILBERT EBON**

22 /s/ Diana S. Ebron, Esq.

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31 *Attorneys for Plaintiff SFR Investments Pool 1,
32 LLC*

33 **ORDER**

34 **IT IS HEREBY ORDERED** that the above Stipulation to Continue Response Deadline
35 to SFR's Motion for Reconsideration of Order (ECF No. 38) until **July 24, 2020** is **GRANTED**.

36 **IT IS SO ORDERED:**

37 
38 _____
39 UNITED STATES DISTRICT JUDGE

40 July 27, 2020
41 DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of GERRARD COX LARSEN, and that on the 17th day of July, 2020 and pursuant to Fed. R. Civ. P. 5, I e-served a true and correct copy of the **STIPULATION AND ORDER TO CONTINUE RESPONSE DEADLINE TO SFR'S MOTION FOR RECONSIDERATION** via the Federal Courts CM/ECF Filing System, and served the following parties addressed as follows:

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Of GERRARD COX LARSEN